



Frankfort Plant Board

Water  
Cable  
Electric  
Security  
Local Phone  
Digital Cable  
Long Distance  
Community TV  
Ethernet/Internet  
Cable Modem/ISP  
Cable Advertising

September 2, 2014

Mr. Jeff Derouen, Executive Director  
Kentucky Public Service Commission  
211 Sower Blvd.  
P.O. Box 615  
Frankfort, KY 40602-0615

RECEIVED  
SEP 04 2014  
PUBLIC SERVICE  
COMMISSION

RE: Case No. 2014-00254

Dear Mr. Derouen:

Enclosed for filing please find an original and six (6) copies of the following:

- FEWPB's Response to Commission Staff's First Request for Information;
- FEWPB's Response to Intervening Wholesale Customers' First Request for Information;
- FEWPB's Response to the Attorney General's Initial Data Request;
- FEWPB's Motion for Deviation.

I appreciate your assistance. If you have any questions or require additional information, please contact me at (502) 352-4541 or [hprice@fewpb.com](mailto:hprice@fewpb.com).

Sincerely,

Hance Price  
Staff Attorney

HP/kp

Enclosures

cc: Donald T. Prather, Esq.  
Raymond Edelman, Esq.  
Jennifer Black Hans, Esq.  
Gregory T. Dutton, Esq.

**Equal Opportunity/Affirmative Action Employer**

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COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

RECEIVED

SEP 02 2014

PUBLIC SERVICE  
COMMISSION

In the Matter of:

Proposed Agreement of the Wholesale )  
Service Rates of Frankfort Electric and )  
Water Plant Board )

Case No. 2014-00254

**MOTION OF FEWPB TO DEVIATE FROM REQUIREMENT GOVERNING  
FILING OF PAPER DOCUMENTS**

Frankfort Electric and Water Plant Board (“FPB”) hereby moves the Kentucky Public Service Commission (“Commission”) pursuant to 807 KAR 5:001, Section 22 for a deviation from the requirement in the Commission’s July 23, 2014 Order in this matter requiring that a hardcopy original and paper copies of responses to requests for information be filed with the Commission. FPB is filing with this motion a hardcopy original and six paper copies of its responses to Commission Staff’s First Request for Information to Frankfort Electric and Water Plant Board (“Staff’s First Request”), except that the attachments to FPB’s responses to Items 2 and 13 of Staff’s First Request are being filed electronically on a CD attached to the original and each copy of the responses.

The attachments to FPB’s responses to Items 2 and 13 of Staff’s First Request are voluminous. Item 2(c) totals approximately 500 pages per response and Item 13 totals approximately 700 pages per response. As such, FPB requests that it be granted a deviation from the requirement to file a hardcopy original and six paper copies of these attachments.

WHEREFORE, FPB respectfully requests that the Commission enter an order granting a deviation to FPB from the requirement to file a hardcopy and six paper copies of the attachments to its responses to Items 2 and 13 of Commission Staff's First Request.

On this the 2<sup>nd</sup> day of September, 2014.

Hance Price

Hance Price  
317 W. Second Street  
P.O. Box 308  
Frankfort, KY 40602

Attorney for Frankfort Electric and  
Water Plant Board

AND

Jack N. Hughes  
Attorney at Law  
124 W. Todd St.  
Frankfort, KY 40601

Attorney for Frankfort Electric and  
Water Plant Board

**CERTIFICATE OF SERVICE**

I, Hance Price, certify that on the 2<sup>nd</sup> day of September, 2014 an original and six (6) copies of this Motion of FEWPB to Deviate from Requirement Governing Filing of Paper Documents was served by hand delivery to:

Mr. Jeff Derouen, Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, KY 40602-0615

And by hand delivery of a true and accurate to:

Kentucky Attorney General's Office  
Hon. Jennifer Black Hans  
Hon. Gregory T. Dutton  
Assistant Attorneys General  
1024 Capital Center Drive  
Suite 200  
Frankfort, KY 40601

Counsel further certifies that true and accurate copies of the Motion were served by mail to:

Hon. Donald T. Prather  
500 Main Street, Suite 5  
Shelbyville, KY 40065

Hon. Raymond Edelman  
148 South Main Street  
Lawrenceburg, KY 40342

Hance Price  
Hance Price